



PFM Consulting LLC

May 27, 2025

Colorado Division of Reclamation, Mining and Safety
1313 Sherman Street
Room 215
Denver, CO 80203

RE: Franciscotti Pit M2007-006 Technical Revision (TR2) Adequacy Review

Mrs. Gibson,

Please see the responses to the Adequacy Items in the letter dated May 13, 2025.

1. Please see the updated Mining Map.
2. The operator would like to clarify the meaning of “unmined areas”. These areas are those that have not previously been mined through other operators or currently through this operator.
3. The operator will only mine previously unmined areas in Phase 1. However, berms may or may not be stockpiled near the previously mined portion of the 111. The operator will not be mining in this reclaimed area but may use areas around it for operational and stockpile needs.
4. The operator concurs with the previously submitted Exhibit S.
5. It is anticipated that through reseeding efforts that will take place in Phase I as mining continues, there will be 61 acres or less that may require reseeding once Phase II commences. The statement is 5b. is accurate and confirmed.
6. Yes, 92 acres will be the maximum affected acreage for the life of the operation, unless an updated mine and reclamation plan is submitted for approval through the division.

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PFM Consulting LLC

7. All roads, including the new haul road fork, will be reclaimed upon closing of the mine.
8. The visual berm will be removed, and the material will be used for reclamation activities.
9. Overburden will be used for backfilling and grading slopes. The operator commits to salvaging 6 inches of topsoil to spread over the disturbed areas. The Mining and Reclamation Plans have been updated and are attached.
10. The applicant intends to ensure that topsoil is located outside of the ongoing mining activities in a perimeter configuration.

Sincerely,

Jodi Schreiber

Jodi Schreiber
Owner, PFM Consulting LLC

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Ted Franciscotti Pit #1 M2007-006

April 2025

Technical Revision

Colorado Division of Reclamation, Mining, and
Safety

Fremont Paving and Redi Mix, Inc.

Ted Franciscotti Pit Mining Map - Exhibit C

Map By HL Industries LLC
Fremont Paving & Redi-Mix
5/23//25



Typical Section



LEGEND

- Pit Boundaries
- Phase Lines
- 10' Contour Lines
- Topsoil
- 30' Buffer



Google Earth

Image © 2025 Airbus

Land Owner:
Joe Benavidez

Land Owner:
Ted Franciscotti

1000 ft

Ted Franciscotti Pit

Phase Map - Exhibit C.1

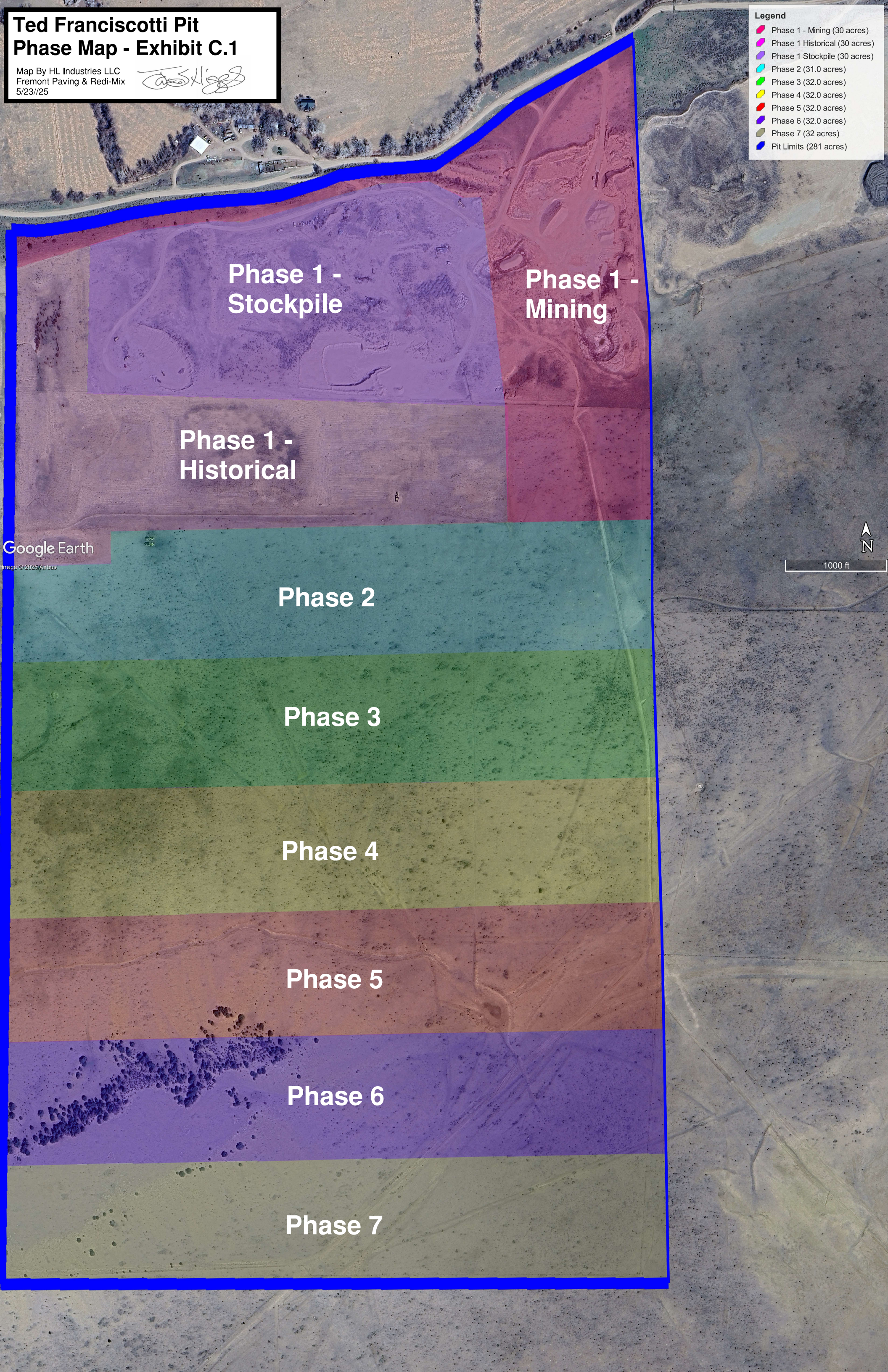
Map By HL Industries LLC

Fremont Paving & Redi-Mix

5/23//25



- Legend
- Phase 1 - Mining (30 acres)
 - Phase 1 Historical (30 acres)
 - Phase 1 Stockpile (30 acres)
 - Phase 2 (31.0 acres)
 - Phase 3 (32.0 acres)
 - Phase 4 (32.0 acres)
 - Phase 5 (32.0 acres)
 - Phase 6 (32.0 acres)
 - Phase 7 (32 acres)
 - Pit Limits (281 acres)



Phase 1 -
Stockpile

Phase 1 -
Mining

Phase 1 -
Historical

Phase 2

Phase 3

Phase 4

Phase 5

Phase 6

Phase 7

Google Earth

Image © 2025 Airbus



1000 ft

Exhibit D

Mining Plan

1. Location and General Land Use Information

The site is located along Huerfano County Road 613 and is composed of dry rangeland. The parcel is currently leased by Ted Franciscotti for gravel operations.

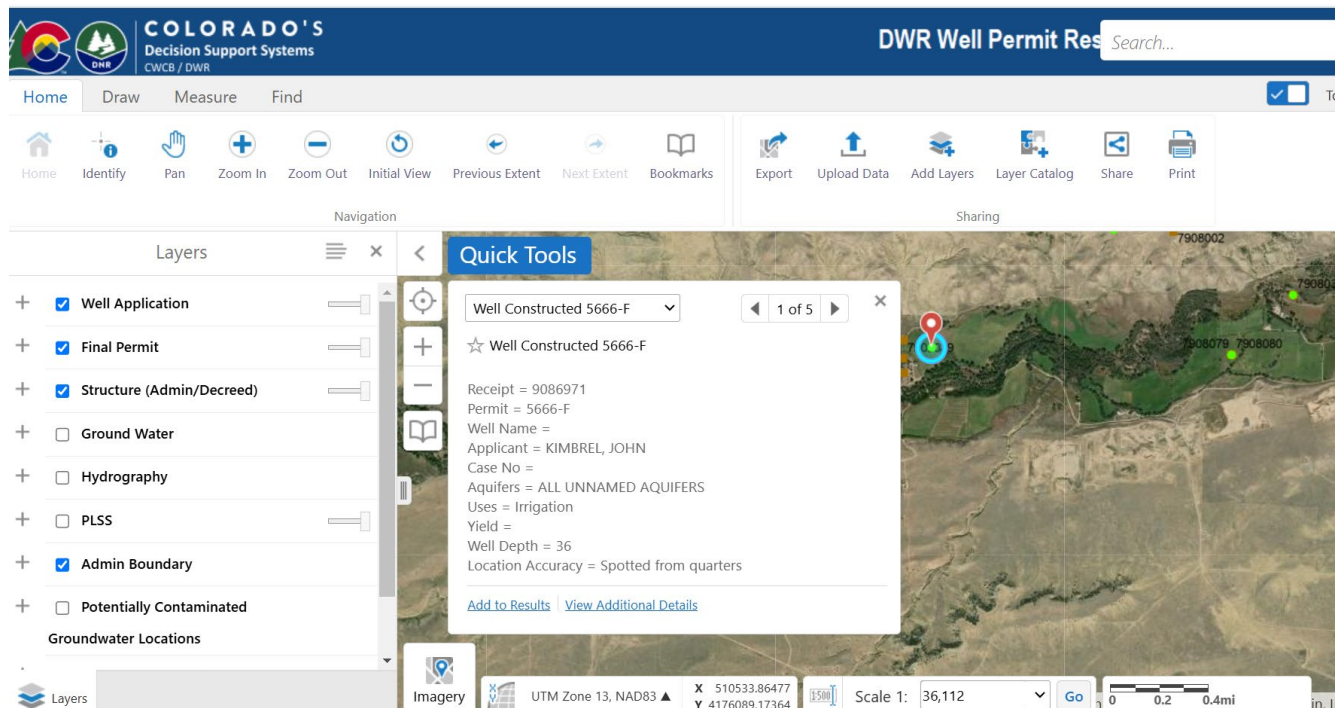
2. Site Geology and Vegetation

Site geology consists of 6 inches of topsoil. Mining will occur to a depth of approximately 20 feet. There are no hazardous or acid forming materials expected to be encountered during excavation. Please refer to the originally submitted Natural Resources Conservation Service (NRCS) soil report for more details on surface composition. A majority of the site is composed of Wiley-Kim Loam. This material is well drained with slow to medium runoff and moderately slow permeability. These soils are used for both rangeland and for irrigated cropland. Native vegetation is blue grama, buffalograss, western wheatgrass, sideoats grama and needleandthread. Vegetation at this site is typical rangeland grasses for this area and covers approximately 30-60% of the site.

3. Surface Hydrology

Stormwater will be kept from leaving the site by using topsoil and overburden stockpiles which will surround the site following the perimeter. The stockpiles will be on the northern edge of the site and will encircle the active mine area of the first phase. This perimeter topsoil berm is shown on the Mining Map. Stormwater that occurs on site will remain on site; however, the soils should allow for stormwater to infiltrate the site and pit floor within 72 hours.

Based on data from the Division of Water Resources Well Permit Search map, groundwater is not anticipated to be encountered during any phase of mining. A structure depicted on the map below shows the well depth at 36 feet. Mining is not anticipated deeper than 20 feet. If groundwater is encountered, excavation will be stopped. The area will then be backfilled with at least two feet of material and no mining will occur beyond that depth.



4. Wildlife

Environmental conditions, such as food and cover availability, is limited due to the climate. Small animals (rabbits, coyotes, etc.) are found in the surrounding environment. The site may also see white tail deer, mule deer, pronghorn antelope, prairie dog, various snakes and lizards. Impacts to wildlife will be mitigated through a weed management plan and reseeding all mined areas with a native rangeland seed mix.

5. Structures

There is a San Isabel Electric Line and County Road 613 that lie within 200' of the permit boundary.

6. General Mine Conditions

The pit will provide aggregate for local construction including gravel, road base, and landscape aggregate. Incidental materials not used for construction material will be used to reconstruct the pit floor and lessen the pit slopes. Mining will occur in a phased manner. Phase I encompasses approximately 92 acres. Mining will occur in phase one with reclamation being concurrent with mining operations. A highwall will proceed through the site from the east to the west with all other areas being reclaimed to a 3H:1V slope and will be a maximum of 200'. The unmined areas and the reject pile within Phase 1 will all be mined out and all current and future mined areas will be sloped to 3H:1V. Mining will continue on the eastern edge of the site and will proceed westerly until all unmined areas have been mined through. Reclamation will occur concurrently to mining.

Mine access is via County Road 613. Mining of the gravel deposit will progress from the east side of the permit boundary in Phase 1 and move to the west. Earthmoving will be accomplished using front end loaders and scrapers. Aggregate will be processed and sized using a crusher and screens. All equipment is portable. Stockpile and processing areas will be in the southwest corner of the site. The pit will be sloped to a 3H:1V or shallower to restore the site's previous drainage pattern.

A portable asphalt hot plant or concrete plant may be located at the site and will be located inside of the processing area as shown on the Mining Map. This area, as well as the stockpile and processing areas, will be prepped by removing and stockpiling topsoil for later reclamation. Mined and processed aggregate will be stored surrounding the portable processing plant(s). As mining progresses to the west, topsoil and overburden berms will be stored around the perimeter of the permit boundary for later use in reclamation.

7. Mining Timetable

The life of the proposed operation is difficult to quantify due to changing economic conditions in the construction industry and onsite aggregate quality. It is anticipated that the site will have a life of approximately 25 years.

8. Mine Facilities and Operation

Toxic or acid-producing materials will not be encountered during the mining operation. No blasting or explosives will occur/be used during mining nor on site. Bulk storage of fuel and small amounts of lubricants may be stored on site and will be either double walled or housed within an earthen berm that will have a capacity of at least 110% of the volume of the tanks to be kept onsite. No permanent structures will be built within the permit area as part of this operation. Water will be used to control dust on site. Water for this operation will be purchased from an offsite source and trucked to the site. It is estimated that the operation will consume up to 10,000 gallons of water per day for dust suppression.

Portable plants will be used onsite for rock crushing. Spray bars will be used in the crushing and screening plant to minimize dust.

Aggregate processing equipment is portable. The processing equipment may move and follow active mining throughout the site. Portable mining equipment such as loaders, dozers, trucks, and excavators will be serviced onsite as needed. Upon reclamation, all portable equipment will be removed from the site.

On-site roads are temporary and will change as mining progresses to the east. Support equipment will come to the site on an as-needed basis. Night mining activity may occur in the operation and portable lighting may be used within the pit from time to time. Portable toilets will be used for employees. Portable asphalt and concrete batch plants may be onsite. Stockpiles of recyclable concrete and asphalt may be onsite and used as a resale product.

Stormwater drainage on the disturbed areas will be directed by berms that border all disturbed areas of the site. The operation will create a depressed area. No stormwater or process water will leave the site and will be directed toward the center of the disturbed area where it will infiltrate within 72 hours. Except for the highwall, which will not exceed 200 feet in length and 20 feet in height, slopes will be maintained at 3H:1V or shallower.

9. Topsoil and Overburden Handling

Topsoil will be salvaged from the disturbed areas and placed in temporary perimeter berms surrounding the disturbed area. Piles are shown at the perimeter of the permit boundary on the Mining Map. These stockpiles will be seeded with the reclamation seed mix listed below. Topsoil is expected to be approximately 6 inches, and overburden is expected to be approximately 0-6 feet. The topsoil and overburden berms will be used for reclamation to construct 3H:1V slopes or shallower and will be segregated. The total deposit is approximately 20 feet in depth. Overburden is a silty clay material and the stratum underneath the deposit is shale. The haul road is approximately 20 feet wide.

6.4.1 Exhibit E Reclamation Plan

1. General Reclamation Plan

The maximum disturbed area to be reclaimed under this permit is 92 acres. Phase 1 will be mined out, backfilling to 3H:1V will be completed, topsoil will be replaced and seeding will be complete prior to moving into Phase II. With this understanding, the only additional reclamation needed in Phase I once Phase II is opened is reseeding as needed. Post-mining land use will return the site back to dry rangeland with native grasses. All areas of the site including will be reclaimed to 3H:1V or shallower. As described in the mining plan, reclamation will occur concurrently with mining. No interior haul roads will remain following reclamation. All reclaimed areas will be sloped, topsoil replaced and seeded with the approved seed mix. All material used for backfilling will be generated from onsite sources. Onsite topsoil will be adequate for reclamation purposes.

2. Topsoil Replacement

Topsoil onsite is anticipated to be 6 inches thick. During mining, all topsoil will be stored in the site perimeter berm of the site and are shown on the Reclamation Map.

3. Haul Roads and Access

One entrance road will connect the site to County Road 613. Onsite haul roads will move as mining moves throughout the site. No interior haul roads will remain following reclamation.

4. Reclamation Timetable

Reclamation will occur concurrently with mining. Mining is anticipated to be completed in 25 years.

5. Revegetation Plan

For reclamation, seed will be drilled at a rate of 8.9 pounds per acre. Heavy furrows may be left to help concentrate moisture and provide shade for vegetation establishment. An NRCS approved seed mix will be used. It is anticipated that the following mix would be adequate for reclamation purposes. Straw mulch will be crimped in at a rate of 2000 pounds per acre. No fertilizer is anticipated to be used during the reclamation of the site.

SEEDING

Seed Mix	Rate – PLS LBS / Acre	Seeds per SQ. FT	Cost /Acre
Blue Grama - Hachita	0.90	14.69	\$25.78
Indiangrass - Cheyenne	0.60	1.83	\$7.38
Little Bluestem - Native	0.40	2.39	\$6.16
Sideoats Grama - El Reno	1.00	3.28	\$24.42
Galleta	0.20	0.73	\$11.09
Western Wheatgrass - Native	4.80	12.12	\$43.23
Needlegrass, Green - Lodorm	0.50	2.08	\$4.32
Winter Fat	0.50	1.27	\$23.36
Totals Seed Mix	8.90	38.39	\$145.75

6. Post-Reclamation Site Drainage

Final reclamation surfaces will be graded so that waters flow in a similar path to the original pre-mining path. Any onsite water will infiltrate within 72 hours.

7. Monitoring Reclamation Success

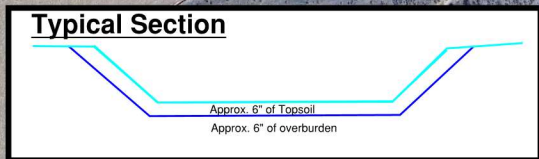
The local NRCS office may assist in any reclamation issues or to help control erosion. Weed mitigation will occur through mechanical removal. If there are issues that arise regarding noxious weed control, Siete Inc. will contact the Huerfano County Noxious Weed Coordinator for guidance.

8. Reclamation Bond

Reclamation cost estimates were calculated on a per acre basis and applied to maximum active mining area of 92 acres.

Legend

- Permit Boundary (282.0 Acres)
- Existing Fence Line
- 5' Finish Contours
- Direction of Water Shed



Ted Franciscotti
Fremont Paving & Redi Mix
Reclamation Map Exhibit F

5/23/25
 Map By James Higgs



Notes:
 1) Floor depth will be determined in the field.
 2) All slopes will be mined at a 3:1, except for the working face.
 3) All contours are approximate.

6.4.2 Exhibit L

Reclamation Costs

Direct Tasks	Unit	Quantity	Cost	Total Cost
Grading Highwalls				
3H:1V Pushdown (200'x20') Dozer	Hours	15+-		\$4,500.00
Placing Topsoil/Fines 30 Acres				
Bull Dozer	Hours	2	\$145.00	\$290.00
Loader	Hours	2	\$145.00	\$290.00
Seeding				
Discing/Chiseling	Hours	2	\$300.00	\$600.00
Drilling	Hours	3	\$300.00	\$900.00
Seed Mix	Acre	1	\$700.00	\$700.00
Mulch	Acre	1	\$187.50	\$187.50
Tracking seed/mulch				
Dozer	Hours	0.33	\$154.00	\$50.82
Area Reclaimed	Acre	92		\$95,049.60
Mobilization Fee	Hours	1	\$1000	\$1,000.00
Indirect Tasks				
Liability Insurance			0.0155	\$1,473.00
Performance Bond			0.015	\$1,425.00
Profit			0.05	\$4,750.00
Job Superintendent	Hours	20	\$88.00	\$1,760.00
Miscellaneous Indirect				\$0.00
Total Bond				\$109,957.00